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17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA

19
20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
25 Championship and UFC,

26 Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**ZUFFA, LLC'S REPLY TO
PLAINTIFFS' OPPOSITION TO
ZUFFA, LLC'S MOTION TO
SEAL PORTIONS OF
PLAINTIFFS' REPLY IN
SUPPORT OF THEIR MOTION
TO CHALLENGE ATTORNEY-
CLIENT PRIVILEGE (ECF NO.
340) AND RELATED EXHIBITS**

1 Plaintiffs once again oppose Zuffa, LLC's ("Zuffa's") motion to seal confidential
 2 documents containing Zuffa's highly sensitive and proprietary business information on the basis
 3 that the documents at issue are not privileged while simultaneously taking no position on whether
 4 the documents at issue contain confidential information independently justifying sealing *and*
 5 improperly rearguing the substance of their privilege challenge. Plaintiffs' opposition to Zuffa's
 6 motion to seal reargues the merits of Plaintiffs' privilege challenge and distracts from the
 7 dispositive issue in a motion to seal – whether good cause exists to justify sealing the documents
 8 at issue.

9 As fully explained in Zuffa's Motion to Seal Plaintiffs' Reply (ECF No. 342), good cause
 10 exists to seal the documents at issue and the portions of Plaintiffs' Reply that reference, discuss,
 11 and quote from documents Zuffa has moved to seal in its sealing motions (ECF Nos. 324, 330,
 12 and 334). The Court should disregard Plaintiffs' misguided attempts to bolster their privilege
 13 arguments and, for the reasons stated in Zuffa's Motion to Seal Plaintiffs' Reply, find that sealing
 14 is appropriate.

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 16
 17
 18 Dated: February 7, 2017

BOIES, SCHILLER & FLEXNER LLP

19
 20 By: /s/ Stacey K. Grigsby

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the Zuffa, LLC's Reply To Plaintiffs' Opposition To Zuffa, LLC's Motion To Seal Portions Of Plaintiffs' Reply In Support Of Their Motion To Challenge Attorney-Client Privilege (ECF No. 340) And Related Exhibits was served on February 7, 2017 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Michael Kim

Michael Kim, an Employee of Boies,
Schiller & Flexner LLP